

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

SAN ANTONIO DIVISION

LOGAN PAUL,

Plaintiff,

v.

STEPHEN FINDEISEN AND COFFEE BREAK
PRODUCTIONS LLC D/B/A COFFEEZILLA,

Defendants.

Civil Action No. 5:24-cv-00717

**DECLARATION OF ANDREW C. PHILLIPS IN SUPPORT OF PLAINTIFF'S
MOTION TO COMPEL PRODUCTION OF COMMUNICATIONS TO AND FROM
HARRY BAGG AND/OR ED LESZCZYNSKI**

I, Andrew C. Phillips, declare as follows

1. I am an attorney admitted, *pro hac vice*, to practice in this Court, and I am one of the lawyers responsible for representing Plaintiff Logan Paul in this action. I submit this declaration in support of Mr. Paul's Motion to Compel Production of Communications to and from Harry Bagg and/or Ed Leszczynski (the "Motion"). The following facts are within my personal knowledge and, if called and sworn as a witness, I would testify competently as to them.

2. On May 7, 2025, Defendants served Mr. Paul with their Second Amended Initial Disclosures, which are attached as Exhibit 1 to this Declaration.

3. On June 9, 2025, I caused to be served on Defendants—through their counsel—the interrogatories reflected in Exhibit 2 to this Declaration. Defendants' subsequent responses to those interrogatories are also reflected in Exhibit 2.

4. On August 4, 2025, I emailed Defendants' counsel to again inquire about obtaining copies of Defendants' communications with Mr. Bagg and/or Leszczynski relating to Mr. Paul or

the CryptoZoo project. Defendants responded the following day, stating that they stand on their objections to producing the requested communications.

5. Despite Mr. Paul's repeated requests, Defendants have persistently declined to produce the copies of the communications in their possession that are the subject of the Motion.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on August 6, 2025

/s/ Andrew C. Phillips
Andrew C. Phillips